

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

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| THOMAS E. PEREZ, SECRETARY<br>OF LABOR,                                      | ) |                          |
|  | ) |                          |
| Plaintiff,   | ) | Case No. 4:14-CV-00997-O |
|  | ) |                          |
| v.   | ) | Judge Reed C. O'Connor   |
|  | ) |                          |
| DALLAS-FORT WORTH DOMICILE,<br>ALLIED PILOTS ASSOCIATION,<br><i>et al.</i> , | ) |                          |
|  | ) |                          |
| Defendants.  | ) |                          |
|  | ) |                          |

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**DEFENDANT ALLIED PILOTS ASSOCIATION'S RESPONSE IN OPPOSITION TO  
THE OPPOSED MOTION FOR SUBSTITUTION OF COUNSEL AND  
OBJECTION TO AGREED MOTION FOR ENTRY OF CONSENT DECREE**

Pursuant to this Court's November 5, 2015, Scheduling Order (Dkt. No. 23), Defendant Allied Pilots Association ("APA") respectfully submits its Response in Opposition to Defendant Dallas-Fort Worth Domicile, APA's ("DFW Domicile") Opposed Motion for Substitution of Counsel (Dkt. No. 21) ("Motion") and Objection to Agreed Motion for Entry of Consent Decree (Dkt. No. 22) ("Objection").

The grounds for the APA's opposition, as more fully set forth in the accompanying memorandum of law, are as follows:

1. As a subordinate unit of the APA, the DFW Domicile is bound by the terms of the APA Constitution and Bylaws ("C&B"), a binding contract between labor organizations.
2. The C&B invests in the APA plenary authority to conduct Domicile elections and to resolve protests over those elections and no authority over such matters to the Domiciles.

3. The C&B also invests in the APA President plenary authority to enter into contracts with third parties on behalf of the APA and its Domiciles and neither the Domiciles nor their elected representatives have any authority over such matters.

4. Given the above, as a matter of law, the DFW Domicile lacks a legal interest in or standing to object to or challenge the Stipulation of Settlement entered into by the APA and Plaintiff Secretary of Labor, U.S. Department of Labor (“DOL”) to resolve a protest concerning the conduct of the 2014 DFW Domicile election.

For these reasons, the APA respectfully submits, the Court should deny the DFW Domicile’s Motion and Objection and grant the pending Agreed Motion for Entry of Consent Decree jointly filed by the APA and the DOL.

Respectfully submitted,

s/ Sanford R. Denison  
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Counsel for Defendants Allied Pilots Association  
and the Dallas-Fort Worth Domicile

Dated: November 10, 2015

**CERTIFICATE OF SERVICE**

On November 10, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that a copy of the foregoing was served electronically to the Plaintiff's counsel at the address shown below:

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Attorney for Plaintiff

In addition, I certify that a copy of the foregoing was served electronically and via first-class mail on the following:

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s/ Sanford R. Denison  
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SANFORD R. DENISON